



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 30, 2005

Sarah Brown, Treasurer  
Ohio State Central & Executive Committee  
211 S. Fifth Street  
Columbus, OH 43215

**Response Due Date:  
October 31, 2005**

Identification Number: C00162339

Reference: Amended May Monthly Report (4/1/05 - 4/30/05), received 5/18/05

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A supporting Line 17 of your report discloses one or more receipts totaling \$55,178.00 from the "State of Ohio". Please amend your report to clarify the nature of these receipts.

-Schedule H4 of your report discloses \$3,000.00 in payments for "political consulting" to individuals. Please clarify whether these individuals are employees of your committee. You are advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal election activity or activities in connection with a Federal election must not be allocated between or among federal, non-federal and Levin accounts. Rather, only federal funds may be used. Any reimbursement from your committee's non-federal or Levin account for salary and wage payments is not permissible and must be returned. Please provide clarification regarding these payments.

-Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "Chairman's Expense Allowance," "Chairman's housing allowance," "chairmans auto lease" and "staff life insurance." Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who

25038901731

spend more than 25% of their compensated time in a given month on Federal election activity or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding this improper allocation activity, your prompt action will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) B and H4 of your report to clarify the following description(s): "giving clubs gifts." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule B of your report discloses reimbursements to individuals for "giving clubs gifts." Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, a memo entry including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information. If itemization is not necessary, you must indicate so in an amendment to this report. 11 CFR §104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3

-Schedule H4 of your report discloses reimbursements to individuals for "Chairman's Expense Allowance," "office supplies," "office supplies-labels," "cell phone, meeting meals," "cell phone, meals, mileage, taxi, hotel" and "hotel, telephone, meals, mileage." Please be advised that when itemizing reimbursements to individuals for goods or services, payment to the original vendors must be itemized as memo entries regardless of amount. Each memo entry must include the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information. 11 CFR §§104.10 and 104.17, and Advisory Opinions 1992-1 and 1996-20, footnote 3

-Schedule H4 of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement have to be itemized as memo entries regardless of the amount. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. Please amend your report to include the missing information. 11 CFR §§104.10 and 104.17, and Advisory Opinion 1996-20, footnote 3

-Schedule H4 of your report discloses \$502.83 in disbursements as "memo" entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding these disbursements.

-Schedule H4 of your report discloses memo entries totaling \$1,094.62, which identify the original vendors of apparent charges made to credit card companies; however, your report discloses no payments associated with these memos. Please amend your report to clarify this apparent discrepancy.

-Commission records indicate the official name of your political committee is "Ohio State Central & Executive Committee." However, your committee has filed this report(s) using the name "Ohio Republican State and Central Executive Committee". While committees may use commonly recognized abbreviations on daily communications (i.e. letterhead and committee checks), committee filings such as disclosure reports and amendments must reflect the official name of the committee, as well as any abbreviation within its title. 11 CFR §102.2(a)(2) and 2 U.S.C. § 433(c) Please amend your Statement of Organization to reflect the apparent change.

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action**

55/10685057

against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,



Laura E. Sinram  
Campaign Finance Analyst  
Reports Analysis Division

2503884447

55/10685052